

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-X

F.C.C., *on his own behalf and on behalf of his minor child, A.C.L.*,

Plaintiffs,

Civil Action
No. 22-cv-5057

(Morrison, J.)
(Wicks, M.J.)

- against -

UNITED STATES OF AMERICA,

Defendant.

-X

STIPULATION

WHEREAS, Plaintiff F.C.C. commenced this action against the United States of America on behalf of himself and his minor child, A.C.L., on August 25, 2022;

WHEREAS, on September 28, 2022, Plaintiff F.C.C. filed a motion to proceed in this action using the initials “F.C.C.” for himself and “A.C.L.” for his minor child to protect their identities from public disclosure, ECF No. 5;

WHEREAS, on October 6, 2022, the Court directed counsel for Plaintiffs to confer with counsel for the United States of America on a proposed briefing schedule with respect to Plaintiffs’ application to proceed using initials; and

WHEREAS, the rules of filing on the electronic docket do not permit anything other than initials for names of minors;

NOW, IT IS HEREBY STIPULATED AND AGREED, by and between the parties that:

1. Plaintiff F.C.C. may in filings in this action use the initials “F.C.C.” to refer to himself and the initials “A.C.L.” to refer to his minor child;

2. The United States of America agrees to use the same sets of initials to refer to the same individuals;

3. In so stipulating, the United States of America does not admit or concede the factual allegations—including, but not limited to, any allegations of physical or mental harm, pain and suffering, or emotional distress—underlying Plaintiffs' application, nor does the United States waive any arguments related thereto, or to venue or jurisdiction in this matter.

Dated: December 22 2022
Washington, D.C.

HANDLEY FARAH & ANDERSON PLLC
200 Massachusetts Avenue, NW
Ste. 7th Fl.
Washington, D.C. 20016

/s/ Matthew Handley
Matthew K. Handley
Rachel Nadas
(202) 559-2411
(202) 899-2991
mhandley@hfajustice.com
radas@hfajustice.com
Counsel for Plaintiffs

Dated: December 22 2022
Brooklyn, New York

BREON PEACE
United States Attorney
Eastern District of New York
Attorney for Defendant
271-A Cadman Plaza East
Brooklyn, New York 11201

/s/ Christopher Volpe
Layaliza K. Soloveichik
Christopher D. Volpe
Assistant U.S. Attorneys
(718) 254-6298
(718) 254-6188
layaliza.soloveichik@usdoj.gov
christopher.volpe@usdoj.gov

So Ordered:

Hon. Nina R. Morrison